



Department of Energy

CPMT

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MAR 30 1992

92-DOE-3585

Ms. Susan Schrader
PRC Environmental Management, Inc.
1099 18th Street
Suite 1960
Denver, Colorado 80202

Dear Ms. Schrader:

Enclosed are comments resulting from the Department of Energy Rocky Flats Office review of the draft Environmental Assessment of the Colloid Polishing Filter Method Technology Demonstration proposed at Rocky Flats Plant. Please contact Tricia Powell of my staff at 966-3260 if there are questions about any of the comments.

Sincerely,

James E. Hartman
for

James J. Hartman
Acting Assistant Manager
for Environmental Management

Enclosure

cc w/Enclosure:
S. Grace, ERD, RFO
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RFO Comments on the Environmental Assessment of the Colloid Polishing Filter Method Technology Demonstration

3/25/92

1. Change the tone in the document to that of a proposal (use would instead of will).
2. This document needs an Affected Environment section that describes the existing environment at RFP. It should include a description of the first ten topics presently included in section 6.0.
3. Sec 1, para 5 -- Describe the administrative mechanism that would be used for EPA RREL to reimburse DOE for the cost of waste disposal. Include a discussion of the payment for damages and cleanup in the event of a release of hazardous material during the project. Include costs associated with decontamination of equipment and analyses to demonstrate adequate decontamination to meet DOE criteria.
4. Sec 1, para 6 -- Eliminate this paragraph. It presupposes that the finding of the EA would be one of no impact.
5. Sec 2.1, para 2 -- Eliminate the final three sentences and do not include these documents as part of the EA.
6. Sec 2.2, para 3 -- the high security area mentioned in the 1st sentence is called the Protected Area.
7. Sec 2.2, para 3 -- Change "routinely routed" to "currently pumped."
8. Sec 4.1 & 4.2 -- Combine the information in sections 4.1 and 4.2, eliminate the duplication of information between them, and move this information to the Background section of the EA.
10. Sec 4.0, Proposed Action -- Provide a complete description of the proposal which includes a description of the site preparation, equipment setup, site cleanup, and personnel requirements as well as a step by step description of the testing process itself.

DOE orders and RFP policy and procedures require that all materials including those to be reused or recycled must meet strict decontamination criteria if they were used in a Radiation Control Area or a Radioactive Material Management Area. The solar ponds meet the criteria for being defined as both. Materials that cannot be released must be decontaminated or be classified as waste unless they would continue to be used in an RCA. Discuss compliance with these requirements and how the equipment would be decontaminated to DOE standards so that it would be allowed to leave RFP when the tests are completed.

Add a description of the decontamination procedure between runs and after testing is completed. Describe the instrumentation, analytical techniques, and quality assurance measures that would be used for the decontamination surveys.

Describe all of the waste types (IDCs) and quantities (as packaged for disposal) that would be generated by the activity. Discuss whether the waste would be EPA property or DOE property. Discuss the potential for all of the equipment used to become waste if it cannot be decontaminated to acceptable levels. Describe the measures that would be taken to ensure that the waste minimization requirements for Federal agencies would be met.

Address whether any of the wastes generated would be land disposal restricted under RCRA. Describe the criteria and quality assurance plan that would be used to assure that the wastes would meet the waste acceptance criteria for a disposal facility.

Address the project's waste storage impacts with reference to the waste storage limits applied to RFP.

Describe the ingredients in the stabilizing agent used with the filter cake and its stability over time when exposed to numerous freeze/thaw cycles. Describe any further treatment in addition to the stabilization agent that would be required for storage or to meet waste acceptance criteria for disposal. It is unclear whether the two drums of filter cake waste described includes the stabilizing agent. Verify that the waste volume includes the stabilizer.

Discuss in the Proposed Action whether PPE would be worn during this project. Verify that the PPE has been included in the projected volume of waste that will be generated by the project.

Add a description in the Proposed Action of the chemicals that would be used in the testing process. Also describe plans to prepare a Spill Prevention Countermeasure and Control plan. Describe the revisions to the RFP RCRA Contingency Plan necessary to include this project.

Describe in the Proposed Action how the treatment and storage vessels would be secondarily contained and include a description of any impacts resulting from construction of secondary containment in the Environmental Impacts section.

The Proposed Action should discuss whether the activity is proposed within either a floodplain or wetland.

Discuss whether returning the water to the solar ponds constitutes a "placement" of liquid wastes under the Hazardous and Solid Waste Amendments of 1984 (40 CFR 265.314).

11. Sec 4.3, para 3 -- Eliminate the sentences that begin "Due to the nature" and "EG&G Officials stated."
12. Sec 4.3, para 11 -- The last sentence should state that purge water would be discharged into the solar ponds.
13. Sec 4.3, para 14 -- Eliminate the sentence that starts "EG&G and DOE may obtain".
14. Figure 4 -- This figure should show the two filter bed configurations described in the Proposed Action so the reader can easily understand the difference between the configurations.

15. Table 1 -- It appears that this represents the proposed test runs at RFP. Please clarify this in the title of the table and the text of the EA.
16. Sec 5.1 -- This section should discuss No Action as not performing the tests at RFP rather than not performing the tests at all. Revise the section to remove the subjective language and make it more fact based. Remove the sentence that begins "As described in the following".
17. Sec 5.3 -- Add this section to discuss an alternative of performing the tests at another location using spiked samples. Discuss the waste generated and the waste control process that would be used.
18. Sec 6.0 -- In this section, if there are no impacts resulting from the proposed action or one of the alternatives for a segment of the environment (such as Cultural Resources), do not discuss that segment of the environment here.

This section should also include a description of the impacts that would result from the No Action alternative and any other viable alternative discussed in the EA.
19. Sec 6.1, para 2 -- This paragraph does not pertain to air quality. Perhaps it should be moved to the description of the Proposed Action.
20. Sec 6.2 -- Remove references to the RCRA IM/IRA from this section and the document in general.
21. Sec 6.2 -- Describe the possible magnitude of an accidental release of waters into the drainage at the site and the impacts that would result. Discuss how spill cleanup materials would be handled and disposed.
22. Sec 6.5 -- Information about T&E species needs to be updated as the T&E situation has changed at RFP. Is the habitat at the project site suitable for T&E plant species? Has a habitat survey or a biological survey for the T&E species been conducted at the proposed site? Include this information in the Affected Environment section.
23. Sec 6.8 -- The description in the first two sentences currently in this section really belongs in the description of the Proposed Action.
24. Sec 6.8 -- Supply data to substantiate the conclusion that breathing apparatus should not be required.
25. Sec 7.0 -- Delete this section.